

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO

In re:

Chapter 7

FREDERICK CAMPBELL,

Debtor.

Case No. 16-61495-rk

RONNIE L TYE,

Plaintiff,

Adversary Proceeding

No. 16- 6037-rk

-against-

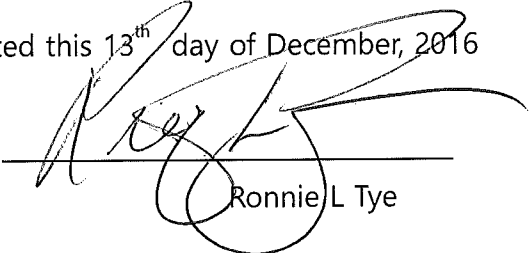
FREDERICK CAMPBELL,

**APPLICATION FOR
ENTRY OF DEFAULT**

Defendant.

Pursuant to Bankruptcy Rule 7055 and Fed. R. Civ. P. 55(a), Plaintiff, RONNIE L TYE, request that the Clerk of this Court enter the default of defendant, Frederick Campbell, for failure to defend or otherwise defend this action. A declaration is also being submitted in support of this application for entry of default.

Dated this 13th day of December, 2016



Ronnie L Tye

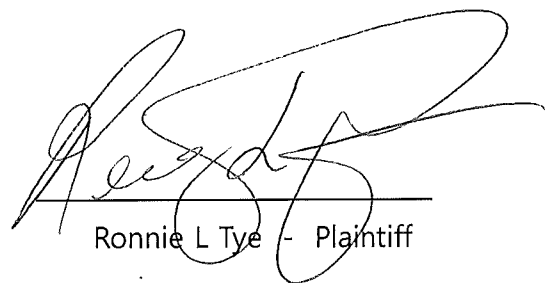
Declaration

I, Ronnie L. Tye, pursuant to 28 U.S.C. § 1746, declare the following:

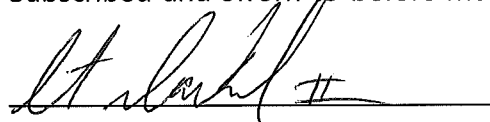
1. I am the Plaintiff in this adversary proceeding.
2. The statements set forth are based upon my personal knowledge, and are true and correct to the best of my knowledge, information and belief.
3. The summons of defendant, Frederick Campbell, was issued by the court on November 10, 2016.
4. The summons, initial pretrial/case management order and complaint were served on defendant, Frederick Campbell, on November 13, 2016 and on counsel for the defendant-debtor, Pauline Aydin Shuler, on November 14, 2016.
5. A responsive pleading was due within 30 days of November 10, 2016.
6. Defendant, Frederick Campbell, has failed to plead or otherwise defend in this action, and the time to do so has expired.
7. To the best of my knowledge, information, and belief, defendant, Frederick Campbell, is neither an infant or incompetent person, nor is the defendant in the military service within the purview of the Servicemembers Civil Relief Act, 50 U.S.C. App. § 501 *et seq.*

I declare under penalty of perjury that the forgoing is true and correct.

Executed on 12/13/2016


Ronnie L Tye - Plaintiff

Subscribed and sworn to before me this 13th day of December, 2016


Signature of Notary Public



CERTIFICATE OF SERVICE

I, Christina Tye
of**
certify:

That I am, and at all times hereafter mentioned was, more than 18 years of age;

That on the 21st day of December, 2016,

I served a copy of an Application for Entry of Default in this proceeding, on:

Pauline Aydin Shuler
Attorney at Law
7100 Whipple Avenue NW, Suite A
Canton, Ohio 44720

the defendant's attorney in this proceeding, by certified mail at defendant's attorney's law office listed above.

I certify under penalty of perjury that the foregoing is true and correct.

Executed on 12/21/2016
[Date]

Christina Tye
[Signature]

5079 Nobles Pond Dr NW Canton, Ohio 44718
**State Mailing Address

CERTIFICATE OF SERVICE

I, Christina Tye
of**
certify:

That I am, and at all times hereafter mentioned was, more than 18 years of age;

That on the 21st day of December, 2016,

I served a copy of an Application for Entry of Default in this proceeding, on:

Frederick Campbell
126 Peach St NE
North Canton, OH 44720

the defendant in this proceeding, by certified mail at defendant's residence listed above.

I certify under penalty of perjury that the foregoing is true and correct.

Executed on 12/21/2016
[Date]

Christina Tye
[Signature]

5079 Nobles Pond Dr NW Canton, Ohio 44718
**State Mailing Address